UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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In re Application of

10-mc-0002 (LAK)

CHEVRON CORPORATION, et al,

ECF Case

Applicants.

Applicants.

This Document Applies to: ALL CASES

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NOTICE OF MOTION TO QUASH OR MODIFY SUBPOENAS SERVED UPON STEVEN R. DONZIGER

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Steven R. Donziger's Motion to Quash or Modify Subpoenas, and upon the accompanying Affidavit of Steven R. Donziger, dated August 25, 2010, and upon the accompanying Declaration of Robert D. Kaplan, dated August 27, 2010, and the exhibits thereto, and upon all papers and proceedings in this case, Steven R. Donziger, by his undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York, 10007, at such time as counsel may be heard, for the entry of an order quashing or modifying the subpoenas served upon Steven R. Donziger by Chevron Corporation and Ricardo Reis Veiga and Rodrigo Perez Pallares, and granting such other relief as this Court may deem just and proper.

Dated: New York, New York August 27, 2010

FRIEDMAN KAPLAN SEILER & ADELMAN LLP

/s/ Bruce S. Kaplan

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